

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BYTEMARK, INC.,

Plaintiff,

VS.

XEROX CORP., ACS TRANSPORT  
SOLUTIONS, INC., XEROX  
TRANSPORT SOLUTIONS, INC.,  
CONDUENT INC., and  
NEW JERSEY TRANSIT CORP.,

Defendants.

Civil Action No. 1:17-cv-01803

## DECLARATION OF ANYA ENGEL

I, Anya Engel, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over twenty-one years of age and have personal knowledge of the following facts or access to information and/or records allowing me to confirm these facts.

2. I am an associate attorney in the law firm of Keyhani LLC and represent Plaintiff Bytemark, Inc. (“Bytemark” or “Plaintiff”).

3. I submit this declaration in support of Plaintiff's Memorandum in Support of Motion to Compel Document Production.

4. Attached hereto as Exhibit A is a true and correct copy of Plaintiff Bytemark, Inc.'s First Set of Requests for Production to Defendants Xerox Corp., ACS Transport Solutions, Inc., Xerox Transport Solutions, Inc., Conduent Inc., and New Jersey Transit Corp. (Counts 3 Through 8), dated December 27, 2018.

5. Attached hereto as Exhibit B is a true and correct copy of Plaintiff Bytemark, Inc.'s Second Set of Requests for Production to Defendants Xerox Corp., ACS Transport Solutions, Inc.,

Xerox Transport Solutions, Inc., Conduent Inc., and New Jersey Transit Corp. (Counts 3 Through 8), dated February 4, 2020.

6. Attached hereto as Exhibit C is a true and correct copy of Bytemark's February 14, 2019 Letter to Defendants Xerox Corp., ACS Transport Solutions, Inc., Xerox Transport Solutions, Inc., Conduent Inc., and New Jersey Transit Corp.

7. Attached hereto as Exhibit D is a true and correct copy of emails exchanged between Bytemark and Defendants Xerox Corp., ACS Transport Solutions, Inc., Xerox Transport Solutions, Inc., Conduent Inc., and New Jersey Transit Corp. during March 2019.

8. Attached hereto as Exhibit E are true and correct copies of Conduent's Objections and Responses to Plaintiff's Second Set of Requests for Production, New Jersey Transit's Objections and Responses to Plaintiff's Second Set of Requests for Production, and Xerox's Objections and Responses to Plaintiff's Second Set of Requests for Production, all dated March 6, 2020.

9. Attached hereto as Exhibit F is a true and correct copy of emails exchanged between Bytemark and Defendants Xerox Corp., ACS Transport Solutions, Inc., Xerox Transport Solutions, Inc., Conduent Inc., and New Jersey Transit Corp. during June 2020.

10. Attached hereto as Exhibit G is a true and correct copy of emails exchanged between Bytemark and Defendants Xerox Corp., ACS Transport Solutions, Inc., Xerox Transport Solutions, Inc., Conduent Inc., and New Jersey Transit Corp. during July and August 2020.

Executed on: December 28, 2020

/s/ Anya Engel